

United States District Court
Southern District of Texas
Corpus Christi Division

United States Courts
Southern District of Texas
FILED

FEB 02 2021

Nathan Ochsner, Clerk of Court

Bobbie Lee Haverkamp
Plaintiff

vs

Civil Action

2:17-CV-18

Jumpers, Hudson, Kerser
Barrow, Johnson, Burrus
Wyrick, Beeson, Budgewater
Defendants

Entry of Default

Filed: Jan 18, 2021

Acting for various John
and Jane Does, who
are comprised of Directors from the UTMBS,
the University of Texas Mental Health Services,
UTMB regional directors, and University of Texas
senior medical directors (D.E. 189, p6)

Entry of Default.

To the Honorable Judge of Said Court,
Now Comes, Ms Bobbie,
AKA the Plaintiff in the above Civil Action
and requests a Entry of Default against
Jumper, Hudson, Keiser, Burrow, Johnson,
Barras, Wyrick, Beeson, Budgewater AKA
FAILURE to Answer Defendants. (FTA Defendants).

Address to the Court.

Your Honor, the Plaintiff's request for
Entry of Default against the FTA Defendants
is made under the most somber conditions
and is depressing / joyless to the Plaintiff.

It has never been the Plaintiff's intentions
to harm the FTA Defendants in the way of
Monetary Damages, only to seek relief for Health
Care, which is needed.

Argument to the Court
for
Entry of Default.

By the numbers so nothing is lost.

In your Honor, the Plaintiff will cut to the
chase in the matter of "Entry of Default".

2) The FTA Defendants Attorney, "Corbello / Strauss" will object to a "Entry of Default" due to a Motion to Dismiss under FRCP 12(b) is always sufficient action to avoid Entry of default.

3) The Plaintiff objects "early on."

4) Your Honor, the purpose of the complaint is to give the Defendants fair notice of the essence of the plaintiff's claims that is clear enough to enable the defendant to answer and defend the suit.

The purpose of the Civil Procedures is to provide a fast, speedy settlement to a Civil Action

5) The FTA Defendants have lost all actions under the 12B motions.

Once the District Court orders the FTA Defendants to answer the present Civil Action the legal clock is reset to where the defendants have 20 days to answer or to answer when the Court deems.

United States Magistrate Judge Hampton

5) cont.

on the 7th day of October, 2020 order
the Defendants to answer the above
civil action November 6, 2020

6) The Defendants ignored the Court order.

7) The Plaintiff brought the matter to
the attention of the Court and Senior
District Court Judge Taghe order the
Defendants to answer by Dec 14, 2020 or
face sanctions.

8) Only one Defendant answered on Dec 14,
2020 that being Dr. Luthicam.

The other nine (9) Defendants, FTA
Defendants ignored the order and failed
to answer.

9) The Plaintiff is filing the "Entry of Default"
Jan 18, 2021, ninety days after the original
order dated Nov 6, 2020.

10) The Plaintiff knows the due position
that the Honorable Correlles is in, but
to not answer a Court order is a
shabby position when the FRCP provide

settlements with District Court directions).

ii) Your Honor, on page 11/21 of the M/R filed by Mag. Judge Hampton the Court can plainly see that the FTA Defendants are providing space between them and the TDCJ Health Service Director, Dr. Linthicum.

"... the MTD Defendants represented that Dr. Linthicum is the TDCJ health service Director and not a CRHCC member."

... that the health service division of TDCJ, which is headed by Dr. Linthicum, has the ultimate power to enforce policies within TDCJ" (D.E 198, pp 23-24)

So, is a logical approach if the FTA Defendants wanted to treat the Plaintiff Gender Dysphoria under the WPATH Standard of care for non-invasive and SRS they would be in a tenuous position of Dr. Linthicum.

The FTA Defendants have policies in place for Long hair, policy for non-invasive treatments, policies that adopt the WPATH Standard of Care for SRS yet ~~then~~

what the FTA Defendants want is the practice of medicine for Gender Dysphoria it is Dr. Luthicam, TDCJ Health Services Director that has the ultimate power to enforce policy, which has led to a denial of Equal protection.

- 12) Your Honor, enclosed is request for Production of documents, dated Jan 6, 2021 and the Plaintiff expects a answer Feb 28, 2021.

The Plaintiff gave the Defendants extra time to answer in the spirit of fairness.

- 13) The Plaintiff expects Dr. Luthicam to answer.

Now will the FTA Defendants answer, will the jury's out on this?

- 14) Under the guidelines of Entry of Default

1) The date the lawsuit was filed in Jan 2017

2) The Defendants were served in Jan 2017

3) The Defendants are not infants or incompetent

14- cont

4) The Defendants are not in the military.

5) The Defendants did not file
a answer to a Court order

A. Mag Judge Hampton - dated Oct 17, 2020

B Did not file a answer to
Senior District Judge Dec 14, 2020

C. Did not file a answer to pro-se
Plaintiff dated Jan 14, 2021

6) The Defendants made no appearance
that will defend after Court order to
answer the Civil Action

The Plaintiff is pro-se, never
has filed a entry of default and begs
the Court for liberally understanding

So Prays the Plaintiff
The Bobbie

Jan 18, 2021

Certification of Service

Your Honor, I swear the facts in
the entry of default is true and correct.

The Plaintiff is going to file a
Entry of Default with the FTA Defendants
thru the Honorable Corbello,
Texas Attorney General
P.O. 12598
Austin, Texas 78711-2598

This was mailed Jan 18, 2021 in the
prisoner post office box.

So Swears the Plaintiff
Ms Bobbie
Jan 18, 2021

The Production of Documents has been
mailed to you Jan 6, 2021